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**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY**

Mr. Bill Caton
Acting Secretary
Office of the Secretary
Federal Communications Commission
1919 M Street, NW
Washington, DC 20554

Re: Reply Comments of Mitretek Systems,
Inc., In the Matter of the North American
Numbering Council, CC Docket No. 92-237

Mr. Caton:

Attached are Mitretek's reply comments on the NANC's North American
Numbering Plan Administrator and Billing and Collection Agent
Recommendation.

*Innovative Technology
in the Public Interest*

Please acknowledge receipt hereof by affixing a notation on the duplicate copy of
this letter furnished herewith for such purpose and remitting same to the bearer.

Sincerely,

H. Gilbert Miller

HGM/dm

cc: Jeannie Grimes (2 copies)
Marian Gordon

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**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

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OFFICE OF THE SECRETARY**

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| In the Matter of: |) | |
| |) | |
| NANC's North American Numbering Plan |) | CC Docket No. 92-237 |
| Administrator and Billing and Collection Agent |) | |
| Recommendation |) | |
| |) | |

Pursuant to the Commission's Public Notice DA 97-1055 (19 May 1997),¹ Mitretek Systems, Inc. ("Mitretek") hereby submits the following reply comments in the above-captioned docket pertaining to the "Administration of the North American Numbering Plan."

Summary

The number of comments received by the Commission in response to its Public Notice addressing the NANC recommendations for the North American Numbering Plan Administrator underscores the importance of numbering issues in the telecommunications marketplace. The vast majority of commentors, representing a cross section of the industry, expressed serious reservations with the NANC recommendation and with the staffing levels inherent in that recommendation. The unambiguous message delivered in the comments was that the critical functions of CO code administration and NPA relief planning would be placed at risk unless the Commission selects an Administrator with adequate staffing, experienced personnel, and neutrality. In this regard, the comments

¹ *The North American Numbering Council (NANC) issues recommendations on the North American Numbering Plan Administrator, billing and collection agent, and related rules; pleading cycle established, CC Docket No. 92-237, Public Notice, DA 97-1055 (19 May 1997).*

reinforce the conclusion reached by the NANPA Working Group Evaluation Team after their thorough evaluation of all the proposals. Mitretek best meets these criteria and represents the lowest risk to the industry for the timely performance of the NANP Administration function.

Reply Comments of Mitretek Systems, Inc.

1. In the matter of the selection of a new North American Numbering Plan (NANP) Administration, the record is complete and contains the essential information required for a selection decision by the Commission. All elements contained in the record enjoy the participation of a broad range of the industry; each industry segment has participated through contributions to the Commission-appointed advisory council (i.e., the North American Numbering Council (NANC)), through contributions to the NANC-appointed working groups comprised of recognized industry and numbering plan experts (e.g., the NANPA Working Group, the NANPA Working Group Evaluation Team), and through contributions of individual industry comments to this record. In summary, the record contains a statement of the requirements, four formal proposals, a comprehensive, detailed evaluation and recommendation by the numbering plan experts comprising the NANPA Working Group Evaluation Team, review and recommendation by the NANC, and review and comment by individual members of industry.
2. The risk of poor performance due to understaffing was raised at each and every step of the evaluation and review process. Both the NANC and the NANPA Working Group

Evaluation Team expressed “concerns regarding the ability of Lockheed to perform the NPA relief and CO code administration functions in an efficient and effective manner because of their proposed small staff.”² The NANPA Working Group Evaluation Team raised further “concerns that should Lockheed be selected, they would not have appropriate, experienced staff in place to meet the required NANPA transition timeframes.”³ The NANPA Working Group Evaluation Team also stated that “the level of staff proposed by Mitretek should ensure timely number resource assignment and relief planning thereby making adequate numbering resources available to all entities including new entrants.”⁴ Comments filed by AirTouch,⁵ California Public Utilities Commission,⁶ Cellular Telecommunications Industry Association (CTIA),⁷ Omnipoint,⁸ Personal Communications Industry Association (PCIA),⁹ Southwestern Bell, Pacific Bell, and Nevada Bell,¹⁰ all cited their concern and belief that the new NANP Administration requires an appropriate level of staff to ensure that the needs of the industry are met in an effective, efficient, and equitable manner. Omnipoint’s comments are representative:

² NANC Report at page 6 and NANPA Working Group Report at page 10.

³ NANPA Working Group Evaluation Team Report at page 11.

⁴ NANPA Working Group Evaluation Team Report at page 9.

⁵ Comments of AirTouch Communications, Inc., dated 20 June 1997.

⁶ Comments of the People of the State of California and the Public Utilities Commission of the State of California on the North American Numbering Council Recommendation, dated 19 June 1997.

⁷ Comments of the Cellular Telecommunications Industry Association, dated 20 June 1997.

⁸ Comments of Omnipoint Communications Inc., dated 20 June 1997.

⁹ Comments of the Personal Communications Industry Association, dated 20 June 1997.

¹⁰ Comments of Southwestern Bell Telephone Company, Pacific Bell and Nevada Bell on the North American Numbering Council’s Recommendation Regarding North American Numbering Plan Administrator and Billing and Collection Agent, dated 20 June 1997.

Omnipoint is concerned that the number of staff proposed by Lockheed is inadequate to respond effectively to the volume of work before the selected NANP/CO Code Administrator. ... The effects of a lack of adequate staffing by the NANP/CO Code Administrator are certain to be felt throughout the industry. Without an effective administrator, new entrants will undoubtedly suffer delays in access to numbers to the detriment of the goals for vibrant and speedy local telecommunications competition.¹¹

3. The selection of Mitretek as the NANPA will provide the industry with critical numbering resources at the lowest risk and in a cost-effective manner. The industry comments reinforce the carefully considered decision of the NANP Working Group Evaluation Team that recommended Mitretek. At each step of the evaluation and review process, evaluators and commentators observed the differences in proposal prices resulting from the significant staffing differences. The difference in the number of staff, and the underlying different assumptions of the level of NANP Administration activities, do not allow a direct comparison of the Mitretek and Lockheed total prices. As noted by the NANPA Working Group Evaluation Team, the price per staff is comparable and approximately equal.¹² However, the NANPA Working Group Evaluation Team also stated that even though they were concerned with the price associated with the Mitretek proposal, the significant beneficial attributes of the Mitretek proposal far outweighed this concern.¹³ AT&T, in its comments, states “AT&T was among the members that cast its vote for Mitretek Systems, and it continues to believe that the Mitretek proposal is superior to Lockheed’s for the

¹¹ Omnipoint at pages 3 and 4.

¹² NANPA Working Group Evaluation Team at page 8.

¹³ NANPA Working Group Evaluation Team at page 9.

reasons discussed in the NANC's report to the Commission."¹⁴ AirTouch notes that "The costs of inefficient administration are too substantial to discount, and the Commission must ensure that the NANPA is, first and foremost, able to accomplish its tasks with the highest level of quality."¹⁵ AirTouch goes on to conclude:

Skimping on number administration resources will not be cost effective. ... AirTouch urges the Commission not to sacrifice its policy goals for what may be illusory, short-term cost savings. ... When these factors are properly considered, Lockheed's proposal is not cost-effective and the Mitretek proposal is clearly that which best serves the industry's needs.¹⁶

With respect to MCI's comment regarding price, it is worth noting that the total cost to the industry will be determined by the size of the problem (i.e., the number of required NANP Administration activities), not the choice of the entity performing the duties.¹⁷ Hence, as previously noted by Mitretek,¹⁸ the selection of the organization with the highest 'function' score (i.e., as determined by the NANPA Working Group Evaluation Team) will ensure the most effective, efficient, and expeditious implementation of the new NANP Administration.

¹⁴ AT&T Corp. Comments, dated 20 June 1997 at page 2.

¹⁵ AirTouch at page 2.

¹⁶ AirTouch at page 3.

¹⁷ Comments of MCI Telecommunications Corporation, dated 20 June 1997 at Section II.

¹⁸ Comments of Mitretek Systems, Inc., dated 20 June 1997 at paragraph 16.c.

4. The commentors encouraged the Commission to ensure neutrality and impartiality in the selected new NANP Administration.^{19, 20, 21}

Conclusion

Mitretek stands ready to begin transition immediately according to the Commission's rules and industry model, and to provide numbering services in a manner that will quickly, effectively, and efficiently meet the needs of the entire telecommunications industry and their customers, the public.

Respectfully submitted,
MITRETEK SYSTEMS, INC.



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Dated: July 3, 1997

¹⁹ CTIA at page 5.

²⁰ PCIA at page 7.

²¹ Comments of WorldCom, Inc., dated 20 June 1997 at page 5.